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November 29, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Ex Parte Presentation

RE: *Application by SBC Communications Inc. for Authorization Under Section 271 of the Communications Act to Provide In-Region Interlata Service in the States of Kansas and Oklahoma. Docket No. 00-217 /*

Dear Ms. Salas:

On Wednesday November 29, 2000, Marty Grambow, Liz Ham, Priscilla Hill-Ardoin, and Eddie Rodriguez from SBC, and Mike Kelly, Brian Hosrt, and Joel Hurley of the accounting firm of Ernst & Young, met with, Tony Dale, Trent Harkrader, Tom Navin, Brent Olsen, and John Stanley to discuss the assertion of the regionalness of SWBT's Operational Support Systems (OSS).

The attached 7 pages were utilized in the discussion. Please find an original and one copy of this letter and attachment enclosed.

Sincerely,

A handwritten signature in cursive script that reads "Edwardo Rodriguez Jr.".

Edwardo (Eddie) Rodriguez

Attachment

No. of Copies rec'd 07
List A B C D E

Southwestern Bell Telephone Company Five State Regional OSS Attestation Engagement

- Introduction
- Background
 - During 2000, E&Y has spent in excess of 16,000 hours testing Performance Measurements and OSS at SBC.
 - FCC Merger Compliance Performance Measurement Attestation Examination. Report issued on August 31, 2000.
 - MoPSC Performance Measurement Attestation Examination. Report issued November 1, 2000.
 - MoPSC OSS Capacity Agreed-upon Procedures Engagement. Report issued November 1, 2000.
 - Five state SWBT OSS Attestation Examination. Report issued October 24, 2000.
- Professional Standards
 - Engagements conducted following the Attestation Standards established by the American Institute of Certified Public Accounts.
 - Attestation Examination – Highest level of assurance provided (Equivalent to an audit of financial statements).
 - Report format follows AICPA guidance.
- Methodology
 - Performance Measures
 - Process Flow Analysis and Creation.
 - General Controls Review.
 - Transactional Testing.
 - Technical Architecture/Code Review (PMs).
 - PM Validation.
 - OSS
 - System Architecture Validation.
 - Review of IP addressing.
 - Application Program Review.
- Conclusions

Report of Independent Accountants

To Management of
Southwestern Bell Telephone Company

We have examined management's assertion, included in the accompanying Report of Management on Southwestern Bell Telephone Company's Operational Support Systems, that as of June 30, 2000, Southwestern Bell Telephone Company ("SWBT") utilized the same operational support systems throughout the SWBT five-state operating region (Arkansas, Kansas, Missouri, Oklahoma and Texas) to support competing local exchange carrier ("CLEC") activity. Management is responsible for the assertion. Our responsibility is to express an opinion on management's assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and included such procedures as we considered necessary in the circumstances. We believe that our examination provides a reasonable basis for our opinion.

In our opinion, management's assertion that as of June 30, 2000, SWBT utilized the same operational support systems throughout the SWBT five-state operating region (Arkansas, Kansas, Missouri, Oklahoma and Texas) to support CLEC activity is fairly stated, in all material respects.

This report is intended solely for the information and use of SWBT and appropriate regulatory agencies and is not intended to be and should not be used by anyone other than these specified parties. However, this report is a matter of public record and its distribution is not limited.

Ernst & Young LLP

October 24, 2000



**Report of Management on
Southwestern Bell Telephone Company's
Operational Support Systems**

Management of Southwestern Bell Telephone Company (SWBT) asserts the same operational support systems were used throughout the SWBT five state operating region (Arkansas, Kansas, Missouri, Oklahoma and Texas) to support competing local exchange carrier (CLEC) activity. A description of each of these operational support systems is listed in Attachment A.

A handwritten signature in black ink, reading "M. N. Gilliam", written over a horizontal line.

Mike Gilliam
Vice President-
Long Distance Compliance
Relief

October 24, 2000

SWBT Operational Support Systems

DataGate	DataGate	DataGate is an application to application interface that allows SWBT and CLEC software programs or applications to exchange information. DataGate provides CLECs with the ability to acquire pre-order information from a single, real time interface, by accessing a of libraries or programs within SWBT OSS (Operation Support Systems).
Easy Access Sales Environment	EASE	EASE is an on-line service order negotiation tool from SWBT's own retail service representatives and is available to CLECs providing resold services for both residence and business customers. Consumer EASE application is used by SWBT and CLECs for pre-ordering and ordering functions for customers with 5 lines or less. Business EASE is used for pre-ordering and ordering for customers with 30 lines or less.
Electronic Data Interchange Services	EDI	EDI acts as an electronic interface between CLECs and SWBT. EDI translates between industry standard formats for ordering and proprietary SWBT back office formats. E Gateway supports ordering and provisioning of both resale and UNEs (Unbundled Network Elements). It allows CLECs to submit LSRs (Local Service Requests) to SWBT, receive acknowledgements, confirmations, and completion statuses, while utilizing the E interface.
LSR Exchange System	LEX	LEX is a GUI (Graphical User Interface) developed by SWBT for CLECs that enables them to perform online wholesale ordering. To access LEX, the CLEC must have the SWBT Toolbar client application on their PC, as well as a valid Toolbar ID.
Verification Gateway	Verigate	Verigate provides CLECs access to the pre-order functionality provided by DataGate through a GUI interface launched from the Toolbar client application that resides on the CLEC's PC.
Local Access Service Request System	LASR	LASR is an application which receives LSRs (Local Service Requests) submitted electronically by CLECs via LEX or EDI (ordering systems). LSRs are stored within a database in LASR and edit checks are performed on the LSR information for MOG eligibility.
Service Order Retrieval and Distribution	SORD	SORD is a mechanized, on-line service order processing system for SWBT. It provides means to create, store, edit, maintain, and distribute requests to other involved work groups for establishing, disconnecting or changing a customer's services.

Appendix – Attestation Standards

- The engagement shall be performed by a practitioner having adequate technical training and proficiency in the attest function.
- The engagement shall be performed by a practitioner having adequate knowledge in the subject matter of the assertion.
- The practitioner shall perform the engagement only if he or she has reason to believe the following two conditions exist:
 - The assertion is capable of evaluation against reasonable criteria that either have been established by a recognized body or are stated in a sufficiently clear and comprehensive manner for a knowledgeable reader to be able to understand them.
 - The assertion is capable of reasonably consistent estimation or measurement using such criteria.
- In all matters relating to the engagement, an independence in mental attitude shall be maintained by the practitioner.
- Due professional care shall be exercised in the performance of the engagement.

Appendix – Attestation Standards

- The work shall be adequately planned, and assistants, if any, shall be properly supervised.
- Sufficient evidence shall be obtained to provide a reasonable basis for the conclusion that is expressed in the report.
- The report shall identify the assertion being reported on and state the character of the engagement.
- The report shall state the practitioner's conclusion about whether the assertion is presented in conformity with the established or stated criteria against which it was measured.
- The report shall state all of the practitioner's significant reservations about the engagement and the presentation of the assertion.
- The report on an engagement to evaluate an assertion that has been prepared in conformity with agreed-upon criteria or an engagement to apply agreed-upon procedures should contain a statement limiting its use to the parties who have agreed upon such criteria or procedures.

American Institute of Certified Public Accountants

Professional Standards

Attestation Standards – Standards for Reporting

AT Statements on Standards for Attestation Engagements

- .58 The practitioner's report on an examination should include the following:
- a. A title that includes the word independent
 - b. An identification of management's assertion (When management's assertion does not accompany the practitioner's report, the first paragraph of the report should also contain a statement of management's assertion.)
 - c. A statement that the assertion is the responsibility of management
 - d. A statement that the practitioner's responsibility is to express an opinion on management's assertion [or the subject matter of management's assertion] based on his or her examination
 - e. A statement that the examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants, and, accordingly, included procedures that the practitioner considered necessary in the circumstances
 - f. A statement that the practitioner believes the examination provides a reasonable basis for his or her opinion
 - g. The practitioner's opinion on whether—
 - (1) Management's assertion is presented [or fairly stated], in all material respects, based on [or in conformity with] the established or stated fn 11 criteria, or
 - (2) The subject matter of the assertion is based on [or in conformity with] the established or stated criteria in all material respects.
 - h. When the assertion has been prepared based on specified criteria that have been agreed upon by the asserter and the specified parties, the practitioner's report should also contain—
 - (1) A statement of limitations on the use of the report because it is intended solely for specified parties (see the fourth reporting standard)
 - (2) A statement, when established criteria exist, that the assertion is not intended to be that which would have been presented if the assertion were presented based on [identify established criteria]
 - i. The manual or printed signature of the practitioner's firm
 - j. The date of the examination report

[Paragraph added, effective for attest reports issued on or after June 30, 1999, by Statement on Standards for Attestation Engagements No. 9.]